

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Robert J. Waldron, Jr. :
Debtor : BANKRUPTCY NO.: 17-16763-elf

RESPONSE TO MOTION FOR RELIEF

Debtor, by his attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Denied. Movant's averment contains factual allegations contained in documents filed with the Court and on record. Th Debtor does not attest to the veracity of said documents and said documents speak for themselves. Movant's allegation is therefore denied.
3. Admitted.
4. Neither admitted, nor denied. The Debtor and Movant have reached a resolution of the instant motion, which will be memorialized via stipulation shortly hereafter.
5. Denied. Movant's averment contains factual allegations contained in documents filed with the Court and on record. Th Debtor does not attest to the veracity of said documents and said documents speak for themselves. Movant's allegation is therefore denied.
6. Denied. Movant's averment contains factual allegations contained in documents filed with the Court and on record. Th Debtor does not attest to the veracity of said documents and said documents speak for themselves. Movant's allegation is therefore denied.
7. Denied. Movant's averment contains factual allegations contained in documents filed with the Court and on record. Th Debtor does not attest to the veracity of said documents and said documents speak for themselves. The averments set forth in this paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.
8. Denied. Movant's averment contains factual allegations contained in documents filed with the Court and on record. Th Debtor does not attest to the veracity of said documents and said documents speak for themselves. . The averments set forth in this paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.

9. Denied. Movant's averment contains factual allegations contained in documents filed with the Court and on record. Th Debtor does not attest to the veracity of said documents and said documents speak for themselves. . The averments set forth in this paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.
10. Denied. By way of further response, Debtor's Schedule A is on record with the Court and speaks for itself.
11. Denied. The averments set forth in this paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.
12. Denied. The averments set forth in this paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.
13. Denied.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Date: March 20, 2020

/s/ Brandon J. Perloff
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